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April 25, 2024

**VIA ECF FILING**

The Honorable Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007-1312

**Re: *Kroll, LLC v. Povinelli***  
**Case No. 1:24-cv-01977**

Dear Judge Vyskocil:

This Firm represents Plaintiff Kroll, LLC (“Kroll”) in this matter (Case No. 1:24-cv-01977 or “Kroll’s Case”). We write jointly with Defendant’s counsel to advise that Defendant Anna Povinelli filed a related case against Kroll in this court (Case No. 1:24-cv-02066 or “Povinelli’s Case”), pending before Judge Jennifer H. Rearden.

Pursuant to Federal Rule of Civil Procedure, Rule 42(a) and S.D.N.Y. Local Civil Rule 13, we respectfully request that the Court consolidate these cases because they “concern the same or substantially similar parties, property, transactions or events,” “there is substantial factual overlap,” “the parties could be subjected to conflicting orders,” and “absent a determination of relatedness there would be a substantial duplication of effort and expense, delay, or undue burden on the Court, parties or witnesses.” S.D.N.Y. L.R. 13(a)(1).

Briefly, Kroll’s Case centers on Povinelli’s alleged misappropriation of Kroll’s proprietary and confidential information, which lead to the termination of her employment with Kroll. Povinelli’s Case asserts Kroll discriminated against Ms. Povinelli based upon her gender, subjected her to sexual harassment and terminated her for pretextual reasons in retaliation for objecting to the harassment and discrimination in violation of New York State Human Rights Law (“NYSHRL”) and New York City Human Rights Law (“NYSHRL”).

Kroll’s and Povinelli’s claims against the other in each case are factually intertwined. Proceeding with these cases separately will not only result in “a substantial duplication of effort and expense,” but could lead to conflicting outcomes on certain factual and legal issues. S.D.N.Y. L.R. 13(a)(1). As such, the parties respectfully request that Kroll’s Case and Povinelli’s Case be consolidated.

**Greenberg Traurig, LLP | Attorneys at Law**

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Thank you for Your Honor's attention to this matter.


Respectfully submitted,

By: /s/ Robert Bernstein  
Robert H. Bernstein  
(*pro hac vice*)  
Michael J. Slocum  
GREENBERG TRAURIG, LLP  
*Attorneys for Plaintiff Kroll, LLC*

cc: All counsel of record (via ECF)

**DENIED. SO ORDERED.**

Date: 5/15/2024  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge